

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**ORDER UNDER 11 U.S.C. 11 U.S.C. § 502(c) AND 105(a) ESTABLISHING
PROCEDURES AND SCHEDULE FOR PROCEEDINGS ESTIMATING
THE AMOUNT OF THE CLAIM HELD BY KARMA AUTOMOTIVE LLC**

Upon the motion, dated July 13, 2023 (the “**Motion**”)² of the Debtors for entry of an order (this “**Order**”) under sections 105(a) and 502(c) of title 11 of the United States Code (the “**Bankruptcy Code**”), for entry of an order establishing procedures and a schedule for the estimation of the amount of a certain contingent, unliquidated, and disputed claim (the “**Karma Claim**”) held by Karma Automotive LLC (“**Karma**”) against Debtor Lordstown Motors Corp. (the “**Company**”), all as more fully described in the Motion; and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding under 28 U.S.C. § 157(b); and venue being proper before this Court under 28 U.S.C.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms used, but not otherwise defined, herein shall have the meanings ascribed to them in the Motion.

§§ 1408 and 1409; and due, sufficient, and proper notice of the Motion having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion (the “**Hearing**”); and upon the record of the Hearing and all of the proceedings had before the Court; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors, their estates, their creditors, their stakeholders, and all other parties-in-interest, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Court will hold a hearing to estimate the Debtors’ liability for the Karma Claim.
3. The following deadlines and procedures shall govern the estimation proceeding:

Date	Event
July 31, 2023	Deadline for Service of Written Discovery Requests
August 10, 2023	Deadline for Document Productions
August 17, 2023	Concurrent Expert Report Deadline
August 24, 2023	Expert Depositions
August 28, 2023	Parties Submit Briefs on Estimation
[_____] , 2023	Evidentiary Hearing and Legal Argument

4. The deadlines set forth above, except the date on which the estimation hearing will commence, may be modified by agreement of the parties or by an order of the Court upon showing of good cause.

5. The Debtors are authorized to take all actions necessary to implement the relief granted in this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.